



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

September 9, 2023

BY ECF

The Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Roman Storm, 23 Cr. 430 (KPF)*

Dear Judge Failla:

The Government respectfully requests, pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, that the Court enter the enclosed proposed protective order to govern discovery in this matter, for the reasons set forth in the proposed order. Counsel for the above-referenced defendant has consented to this proposed order, which has been executed by the parties.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: /s/ Thane Rehn
Thane Rehn
Assistant United States Attorney
(212) 637-2354

cc: Defense counsel (via ECF)